

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES <i>ex rel</i> PLUNKERT, Plaintiff, v. MARYLAND BROADBAND COOPERATIVE, et al., Defendants.		Civ No. SAG-19-3375
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**Consent Motion To Extend Time For Defendants Wayne Kacher, Jr.,
Bel Air Underground Services, Inc. And Pro Comm E.L.S. LLC To Respond To Complaint**

Pursuant to Local Rule 109(9), Defendants Wayne Kacher, Jr., Bel Air Underground Services, Inc. and Pro Comm E.L.S. LLC respectfully request an enlargement of time to August 31, 2023 to respond to the Complaint filed by Plaintiff-Relator, Krah Plunkert.

Counsel for Plaintiff-Relator consents to this motion.

Good cause exists for this extension for the following reasons:

The Summonses require Kacher, Bel Air Underground and Pro Comm to serve an answer or a motion under Rule 12 within 21 days after service.

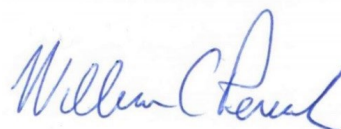
Defendant Kacher is a defendant in a related criminal action, *United States v. Mitchell, et al*, 21-cr-00090 (SAG). After being served with the summons in this action, Kacher and co-defendant Mitchell submitted a joint motion for a stay of this civil action. On July 14, 2023 the Court granted in part and denied in part the joint motion.

Counsel for Kacher intends to file a motion under Rule 12, and is diligently preparing same. However, counsel has longstanding vacation plans, and is unable to complete preparation before departing, and therefore requests additional time to August 31, 2023 to serve the motion.

A proposed order is attached.

July 16, 2023

Respectfully Submitted

A handwritten signature in blue ink, reading "William C. Pericak". The signature is fluid and cursive, with the first name "William" and last name "Pericak" clearly legible.

William C. Pericak
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